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SEP 28 1995

COMMUNICATIONS SECTION  
OFFICE OF THE SECRETARY

September 28, 1995

VIA HAND DELIVERY

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

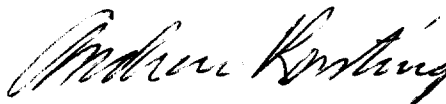
Re: MM Docket No. 92-214  
RM-8062  
Columbia and Bourbon, Missouri

Dear Mr. Caton:

Enclosed herewith on behalf of Zimmer Radio of Mid-Missouri, Inc., licensee of Station KCMQ(FM), Columbia, Missouri, are an original and four copies of its Supplemental Comments in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate directly with this office.

Very truly yours,



Andrew S. Kersting  
Counsel for  
Zimmer Radio of Mid-Missouri, Inc.

Enclosure

cc: Certificate of Service (w/ encl.)

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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SEP 28 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) MM Docket No. 92-214  
Table of Allotments ) RM-8062  
FM Broadcast Stations ) RM-8144  
(Columbia, Bourbon, Leasburg, ) RM-8145  
Gerald, Dixon and Cuba, Missouri) RM-8146  
 ) RM-8147  
To: Chief, Allocations Branch

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**SUPPLEMENTAL COMMENTS**

Zimmer Radio of Mid-Missouri, Inc. ("Zimmer"), licensee of Station KCMQ(FM), Channel 244C3, Columbia, Missouri, by its attorneys, hereby submits Supplemental Comments in the above-captioned proceeding.<sup>1</sup> In support of these comments, the following is stated:

**I. Introduction**

Zimmer Radio of Mid-Missouri, Inc., is the successor-in-interest to Al Greenfield, d/b/a The Greenfield Group, Receiver ("Greenfield"), the former licensee of Station KCMQ. The assignment of license for Station KCMQ from Greenfield to Zimmer was consummated on August 11, 1993.

Station KCMQ is licensed to operate on Channel 244A at Columbia, Missouri (BLH-4969). Zimmer currently is operating with program test authority as a Class C3 facility pursuant to construction permit BMPH-920901ID. By letter dated July 26, 1993, the FCC's FM Branch advised

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<sup>1</sup>

Contemporaneously herewith, Zimmer is filing a Request for Leave to file Supplemental Comments under separate cover.

Zimmer that KCMQ's pending license application (BLH-930310KB) will be held in abeyance until Station KNSX(FM), Steelville, Missouri, which has been off the air for some time, is granted a license for operations on Channel 227C2.

On July 30, 1992, Zimmer's predecessor-in-interest, Greenfield, filed a "Petition for Rulemaking and a Request for Modification of Authorization" (RM-8062), seeking the substitution of Channel 244C1 for Channel 244C3 at Columbia, Missouri, and the corresponding modification of KCMQ's authorization. To accommodate the upgrade of KCMQ, Greenfield proposed to substitute either Channel 297A or Channel 231A for the then vacant Channel 244A allotment at Bourbon, Missouri. On September 22, 1992, the FCC released a Notice of Proposed Rule Making in MM Docket No. 92-214, 7 FCC Rcd 6230 (Aud. Serv. Div. 1992) ("NPRM"), which proposed to make the requested upgrade of KCMQ on Channel 244C1, and to either substitute Channel 297A for the vacant Channel 244A allotment at Bourbon or to delete the Bourbon allotment altogether. Greenfield and Zimmer filed Joint Comments supporting the proposal set forth in the NPRM on November 3, 1992, and Joint Further Reply Comments on January 13, 1993 ("Joint Further Reply Comments").

## II. The Counterproposals

The four above-captioned counterproposals were filed in response to the NPRM. Jeff Weinhaus proposed that either Channel 297A or Channel 231A be allotted to Leasburg, Missouri (1990 Census population: 289) (RM-8144). The Weinhaus proposal conflicted with Greenfield's proposed substitute channels for the Bourbon allotment.

Tony Knipp proposed that Channel 297C3 be allotted to Gerald, Missouri (1990 U.S. Census population: 888) (RM-8145). The proposed Gerald allotment conflicted with the proposed Channel 297A substitution channel for Bourbon.

Central Missouri Broadcasting, Inc. ("CMBI"), licensee of Stations KLIK(AM)/KTXY(FM), Jefferson City, Missouri, and a potential competitor of Station KCMQ, proposed that Channel 243A be allotted to Dixon, Missouri (1990 U.S. Census population: 1,585) (RM-8146). The proposed Dixon allotment was the only counterproposal which was in direct conflict with the proposed Channel 244C1 allotment at Columbia and corresponding upgrade of KCMQ.

In addition, Lake Broadcasting, Inc. ("Lake"), licensee of Station KBMX(FM), Eldon, Missouri, and permittee of Station KFXE(FM), Cuba, Missouri, filed an application on November 13, 1992, for a construction permit for a new FM station on Channel 244A at Bourbon.<sup>2</sup> Lake also proposed that non-adjacent Channel 297C3 be substituted for Channel 271A at Cuba (1990 U.S. Census population: 2,537), and that the construction permit of Station KFXE be modified to specify operation thereon (RM-8147). Lake's proposed non-adjacent channel upgrade of KFXE's construction permit conflicted with the proposed Channel 297A substitute channel at Bourbon.

On December 20, 1993, Knipp voluntarily withdrew his counterproposal for the allotment of Channel 297C3 to Gerald, Missouri, and requested its dismissal. Similarly, on June 7, 1994, Weinhaus voluntarily withdrew his counterproposal for the allotment of Channel 297A or Channel 231A to Leasburg, Missouri, and requested its dismissal.

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Lake shares common officers and stockholders with Contemporary Broadcasting, Inc. ("CBI"), licensee of Station KFMZ(FM), Columbia, which is a direct competitor of Station KCMQ. CBI filed an unsuccessful petition to deny Greenfield's application to assign the KCMQ license to Zimmer.

In addition, on November 5, 1992, Town and Country Communications, Inc. ("Town and Country"), licensee of Station KATI(FM) (formerly KZMO-FM), California, Missouri, filed a petition for rulemaking seeking to upgrade Station KATI from Channel 232C2 to Channel 232C1. However, the Commission found Town and Country's petition unacceptable because it was dependent upon final action in another contested rulemaking proceeding. Although Town and Country sought reconsideration of the dismissal of its petition, the Commission denied reconsideration by letter dated June 6, 1995, and that denial is now final.

### III. Discussion

As a result of the voluntary dismissal of the petitions for rulemaking filed by Weinhaus and Knipp to allot either Channel 297A or Channel 231A to Leasburg, Missouri (RM-8144) and Channel 297C3 to Gerald, Missouri (RM-8145), and the Commission's denial of Town and Country's petition for reconsideration of the dismissal of its petition to upgrade Station KATI(FM), California, Missouri, from Channel 232C2 to Channel 232C1. Zimmer's proposal to upgrade Station KCMQ from Channel 244C3 to Channel 244C1 can now be adopted to expedite expanded FM service to the public without prejudicing the rights of any party to this proceeding.

As demonstrated in the attached Technical Statement of W. Jeffrey Reynolds of duTreil, Lundin & Rackley, Inc., the Commission's denial of Town and Country's petition for reconsideration removed the former conflict between substitute Channel 231A at Bourbon, and the Town and Country proposal to upgrade Station KATI from Channel 232C2 to Channel 232C1. As shown in the attached Technical Statement, Channel 221A can now be allotted at Dixon, Missouri, consistent with the Commission's mileage separation and city-grade coverage requirements, in lieu of Channel 243A, to satisfy CMBI's request for a new channel at Dixon. Thus, the only

counterproposal in this proceeding which directly conflicts with KCMQ's Channel 244C1 upgrade proposal can be accommodated through the allotment of an alternative channel.

Similarly, Channel 231A can be allotted to Bourbon, Missouri, consistent with the mileage separation and city-grade coverage requirements, in lieu of Channel 244A. Thus, the allotment of a channel at Bourbon no longer is an impediment to KCMQ's proposed Channel 244C1 upgrade.

Although Lake filed a "first come, first serve" application for Channel 244A at Bourbon specifying a site which does not meet the separation requirements for Channel 231A, the rulemaking petition filed by Greenfield (the former licensee of KCMQ), which was filed with the Commission prior to Lake's application, included a proposal to change the Bourbon Channel 244A allotment. Thus, in accordance with Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments, 7 FCC Rcd 4917 (1992). recon. granted in part, 8 FCC Rcd 4743 (1993), the conflict should be resolved under the Commission's existing policy for making substantive choices between conflicting proposals. Accordingly, Lake should be required to amend its application to specify a non-conflicting transmitter site.

Moreover, as a result of the voluntary dismissal of the petitions for rulemaking for Channels 231A or 297A at Leasburg and Channel 297C3 at Gerald, Lake's counterproposal to upgrade Station KFXE, Cuba, Missouri, from Channel 271A to Channel 297C3 can be accommodated consistent with the mileage separation and city-grade coverage requirements.

Finally, as noted above, Station KNSX(FM), Steelville, Missouri, is off the air. Pursuant to action taken in MM Docket No. 87-335, the Commission directed KNSX to move to Channel 227C2. Station KNSX holds a construction permit (File No. BPH-910822JU) for operation on Channel 227C2, and has proposed an upgrade to Channel 227C1 in MM Docket No. 90-66. Thus,

KNSX's former operation on Channel 244A will not impede KCMQ's proposed Channel 244C1 upgrade.


#### IV. Conclusion

As demonstrated in the Joint Further Reply Comments (filed January 13, 1993), the proposed operation of Station KCMQ on Channel 244C1 will provide service to 335,000 people in an land area encompassing 16,435 square kilometers. This represents an increase in population served of 186,495, or 226% of the 148,505 people authorized to receive service from the facilities authorized in KCMQ's modified construction permit (BMPH-920901ID). Moreover, the Channel 244C1 upgrade will result in an increase in land area covered of 12,090 square kilometers, or 378% of KCMQ's modified construction permit coverage of 4,345 square kilometers. As a result of the dismissal of the petitions for rulemaking seeking the allotment of Channels 231A or 297A at Leasburg, and Channel 297C3 at Gerald, Missouri, as well as the Commission's denial of Town and Country's petition for reconsideration seeking to upgrade Station KATI, California, Missouri, from Channel 232C2 to Channel 232C1, the Commission now may (1) grant the upgrade of KCMQ to Channel 244C1 at Columbia; (2) allot Channel 221A as a new assignment to Dixon; (3) replace the Channel 244A allotment at Bourbon with Channel 231A; and (4) upgrade KFXE's assignment at Cuba to Channel 297C3. Zimmer is not attempting to reargue the merits of any proposal presently before the FCC, but, rather, is proposing a resolution of this protracted rulemaking proceeding which has been pending before the Commission for more than three years. As demonstrated herein, the Commission now can expedite the substantial public interest benefits associated with the KCMQ upgrade without prejudicing the rights of any party hereto. Therefore, Zimmer submits that a grant of its proposal for immediate resolution of this proceeding would be in the public interest.

WHEREFORE, in light of the foregoing, Zimmer Radio of Mid-Missouri, Inc., respectfully requests the FCC to resolve this proceeding by issuing a Report and Order (1) granting the upgrade of KCMQ to Channel 244C1 at Columbia and modifying its authorization accordingly; (2) allotting Channel 221A as a new assignment to Dixon; (3) replacing the Channel 244A allotment at Bourbon with Channel 231A; and (4) upgrading KFXE's assignment at Cuba to Channel 297C3.

Respectfully submitted,

ZIMMER RADIO OF MID-MISSOURI, INC.

By:   
Frank R. Jazzo  
Andrew S. Kersting

Its Counsel

Fletcher, Heald & Hildreth, P.L.C.  
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11th Floor  
Rosslyn, Virginia 22209

September 28, 1995



TECHNICAL STATEMENT  
SUPPORTING COMMENTS OF  
ZIMMER RADIO OF MID-MISSOURI, INC.  
CONCERNING MM DOCKET NO. 92-214

This Technical Statement has been prepared on behalf of Zimmer Radio of Mid-Missouri, Inc., licensee of FM station KCMQ on channel 244 (96.7 MHz) at Columbia, Missouri. As part of the Commission's pending Notice of Proposed Rule Making (NPRM) in MM Docket No. 92-214<sup>1</sup>, station KCMQ proposed to upgrade the channel 244C3 allotment at Columbia to channel 244C1. The purpose of these technical comments is to provide information to demonstrate that the KCMQ Class C1 upgrade proposal can be severed from the proceeding and granted.

This solution for KCMQ is made possible by the Commission's final action denying the petition for reconsideration filed by Town and Country Communications, Inc. (Town and Country). Town and Country had filed a petition for rule making to upgrade station KZMO-FM at California, Missouri from channel 232C2 (94.3 MHz) to channel 232C1. The Commission found the Town and Country petition unacceptable when filed and returned it. Town and Country subsequently sought reconsideration. By letter of June 6, 1995, the Commission denied the Town and Country petition for reconsideration. This final action clears up an impediment in MM Docket No. 92-214.

Figure 1 (sheets 1 through 3) provides a separation study for the proposed KCMQ channel 244C1

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<sup>1</sup>Adopted August 24, 1992, comments were due November 13, 1992, and reply comments were due November 30, 1992.

upgrade assignment for Columbia, Missouri. The separation study employs a copy of the Commission's FM database. The study is based on the allotment reference site used in the proceeding (38-37-40, 92-07-00). As discussed below, there is a solution for each of the apparent separation problems (Dixon, Steelville & Bourbon, MO).

As counterproposed in this rule making proceeding and shown in Figure 2 attached, channel 221A (92.1 MHz) can be allotted to Dixon, Missouri instead of channel 243A (96.5 MHz). This removes Dixon as an impediment to the KCMQ upgrade.

According to the Commission's lists of silent FM stations, KNSX(FM) at Steelville is dark. The Commission ordered KNSX to channel 227C2 by action taken in MM Docket No. 87-335. Station KNSX holds a construction permit (BPH-910822JU) for operation on channel 227C2. In addition, KNSX proposed to upgrade the channel 227C2 allotment to channel 227C1 in MM Docket No. 90-66. Therefore, the former KNSX channel 244A operation should not be an impediment to KCMQ's proposed channel 244C1 upgrade.

As counterproposed in this rule making proceeding and shown in Figure 3 attached, channel 231A (94.1 MHz) can be allotted to Bourbon, Missouri in lieu of channel 244A. As noted above, the Commission's letter denying Town and Country's petition for reconsideration removes the former conflict between channel 231A at Bourbon and the Town and Country proposal to upgrade station KZMO at California, Missouri from channel 232C2 to channel 232C1. This subsequently removes Bourbon as the impediment to KCMQ's proposed channel 244C1 upgrade.

Sheet 4 of Figure 1 is a map showing the area meeting the Commission's minimum separation requirements based on the study provided on sheets 1 through 3 of Figure 1. The channel 244C1 allotment reference site and Columbia city limits are identified. The Columbia city limits are based on information contained in the 1990 US Census for Missouri. The furthest point of the Columbia city limits from the allotment reference site is approximately 46 kilometers (29 miles). The predicted 3.16 mV/m (70 dBu) principal city contour for a maximum facility Class C1 station (100 kW, 299 meters) extends approximately 50 kilometers (31 miles). This complies with the Commission's allotment requirements.

Sheets 1 and 2 of Figure 2 are the separation study for channel 221A at Dixon, Missouri. The study is based on the allotment reference site used in the proceeding (37-58-30, 92-10-10). As shown, all of the Commission's minimum separation requirements are met.

Sheet 3 of Figure 2 is a map showing the area to locate channel 221A in compliance with the Commission's minimum separation requirements. The Dixon city limits and channel 221A allotment reference point are identified. The Dixon city limits are based on information contained in the 1990 US Census for Missouri. The furthest point of the Dixon city limits from the channel 221A allotment reference site is approximately 9 kilometers (5.5 miles). The predicted 3.16 mV/m principal city contour for a maximum facility Class A station (6 kW, 100 meters) extends approximately 16 kilometers (10 miles). This satisfies the Commission's allotment requirements.

Figure 3 (Sheet 1) is the separation study for channel 231A at Bourbon, Missouri. The study is based on the channel 231A allotment reference site used in the proceeding (38-05-00, 91-15-00). As noted, the petition for rule making from Jeff Weinhaus to allot channel 231A to Leasburg, Missouri (MM Docket 92-214, RM-8144) has been dismissed. Hence, all of the Commission's minimum separation requirements are met.

Sheet 2 of Figure 3 is a map showing the area to locate channel 231A in compliance with the Commission's minimum separation requirements. The Bourbon city limits and channel 231 allotment reference point are identified<sup>2</sup>. The Bourbon city limits are based on information contained in the 1990 US Census for Missouri. The furthest point of the Bourbon city limits from the channel 231A allotment reference site is approximately 9 kilometers (5.5 miles). The predicted 3.16 mV/m principal city contour for a maximum facility Class A station (6 kW, 100 meters) extends approximately 16 kilometers (10 miles). This complies with the Commission's allotment criteria.

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<sup>2</sup>It is recognized that a "first come, first serve" application for channel 244A was filed by Lake Broadcasting, Inc. (BPH-921112MH) for a site which does not meet the separation requirements for channel 231A at Bourbon. The Greenfield Group's petition, which included a proposal to change the Bourbon channel 244A allotment, was filed with the Commission prior to Lake's application. In accordance with the Commission's decision in MM Docket No. 91-348, concerning conflicts between applications and petitions for rule making to amend the FM table of Allotments, the Commission's substantive policy for resolving conflicts is applicable. Hence, it is expected that the Bourbon applicant will be required to amend its application to specify a non-conflicting site. Report and Order in MM Docket No. 91-348 released August 4, 1992; Memorandum, Opinion and Order released July 13, 1993.

Sheets 1 through 3 of Figure 4 are the separation study for channel 297C3 (107.3 MHz) at Cuba, Missouri. The study is based on the allotment reference site used in this proceeding (38-03-49, 91-24-37), and which is also the authorized site for station KFXE(FM) on channel 271A (102.1 MHz) at Cuba, Missouri. In the instant proceeding (MM Docket No. 92-214), station KFXE counterproposed an upgrade to channel 297C3. As shown, all of the Commission's minimum separation requirements are met. As also noted, the petition for rule making for channels 231A, 263A or 297A at Leasburg, Missouri was dismissed as was the petition for rule making for channel 297C3 at Gerald, Missouri.

Sheet 4 of Figure 4 is a map showing the area to locate channel 297C3 in compliance with the Commission's minimum separation requirements. The Cuba city limits and channel 297C3 allotment reference point (KFXE site) are identified. The Cuba city limits are based on information contained in the 1990 US Census for Missouri. The furthest point of the Cuba city limits from the channel 297C3 allotment reference site is approximately 3 kilometers (2 miles). The predicted 3.16 mV/m principal city contour for a maximum facility Class C3 station (25 kW, 100 meters) extends approximately 23 kilometers (14 miles). This satisfies the Commission's allotment requirements.

As demonstrated above, the Commission can upgrade KCMQ to channel 244C1 at Columbia, allot channel 221A as a new assignment to Dixon, replace the channel 244A allotment at Bourbon with channel 231A, and upgrade KFXE's assignment at Cuba to channel 297C3. This action

will not affect other FM allotments or assignments,  
including other proposals in the instant proceeding. If  
there are questions concerning this Technical Statement,  
please contact the office of the undersigned.

*W. Jeffrey Reynolds*

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du Treil, Lundin & Rackley, Inc.  
240 N. Washington Blvd., Suite 700  
Sarasota, FL. 34236  
(941) 366-2611

September 7, 1995

FM SEPARATION STUDY

Job Title : Proposed KCMQ C1 Allotment Upgrade      Separation Buffer 50 km  
FCC DB Date : 08/17/95  
Channel 244C1 ( 96.7 MHz)      Coordinates : 38-37-40 92-07-00

| Call<br>Status                                    | City<br>State         | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|---|-----------------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KLRQ<br>LIC                                       | Clinton<br>MO         | BLH901015KB  | 241C<br>96.1     | 100.<br>301.0      | 38-28-27<br>93-30-28  | 262.4              | 122.47        | 105<br>CLEAR |
| K242AN<br>CP                                      | Lebanon<br>MO         | BPFT950403TE | 242D<br>96.3     | .250<br>95.0       | 37-40-50<br>92-39-32  | 204.4              | 115.39        | 0<br>TRANS   |
| Translator for KUMR, Rolla, MO                    |                       |              |                  |                    |                       |                    |               |              |
| PADD  | Dixon<br>MO           | RM8146       | 243A<br>96.5     | .0                 | 38-06-00<br>92-01-00  | 171.5              | 59.24         | 1            |
| Counterproposal-Site Restriction 13.9km northeast |                       |              |                  |                    |                       |                    |               |              |
| KXTR<br>LIC                                       | Kansas City<br>MO     | BLH870427KC  | 243C<br>96.5     | 100.<br>300.0      | 39-00-57<br>94-30-24  | 282.5              | 211.98        | 209<br>CLOSE |
| KCMQ<br>PADD<br>PRM                               | Columbia<br>MO        | RM8062       | 244C1<br>96.7    | .0                 | 38-37-40<br>92-07-00  | .0                 | .00           |              |
| KCMQ<br>CPM                                       | Columbia<br>MO        | BMPH920901ID | 244C3<br>96.7    | 18.0<br>105.0      | 38-57-18<br>92-16-20  | 339.7<br>SS        | 38.77         |              |
| From channel 244A per D89-74                      |                       |              |                  |                    |                       |                    |               |              |
| KCMQ<br>LIC                                       | Columbia<br>MO        | BLH4969      | 244A<br>96.7     | 3.00<br>49.0       | 38-58-01<br>92-18-39  | 336.0              | 41.27         |              |
| *To channel 244C3 per D89-74                      |                       |              |                  |                    |                       |                    |               |              |
| K244BH<br>LIC                                     | Camdenton, etc.<br>MO | BLFT850924TF | 244D<br>96.7     | .080<br>198.0      | 38-01-13<br>92-45-27  | 219.8              | 87.69         | 0<br>TRANS   |
| TRANSLATOR FOR KFBDFM, WAYNESVILLE, MO.           |                       |              |                  |                    |                       |                    |               |              |

<sup>1</sup>Alternative for Dixon, MO allotment proposed on channel 221A (See Figure 2).

FM SEPARATION STUDY

Job Title : Proposed KCMQ C1 Allotment Upgrade      Separation Buffer 50 km  
FCC DB Date : 08/17/95  
Channel 244C1 ( 96.7 MHz)      Coordinates : 38-37-40 92-07-00

| Call<br>Status   | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|--|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KNSX   | Steelville    |              | 244A             | 0.50               | 37-55-40              | 142.9              | 97.32         | <sup>2</sup> |
| LIC  | MO            | BLH850613KH  | 96.7             | 195.0              | 91-26-50              |                    |               |              |
| *TO CHANNEL 227C2 PER D87-335  |               |              |                  |                    |                       |                    |               |              |
|  | Bourbon       |              | 244A             |                    | 38-06-10              | 125.1              | 101.01        | <sup>3</sup> |
| ALC  | MO            | Docket89-74  | 96.7             | .0                 | 91-10-22              |                    |               |              |
| Site Restricted-Effective 2-28-91-"First Come/First Served Allotment |               |              |                  |                    |                       |                    |               |              |
| NEW  | Bourbon       |              | 244A             | 3.                 | 38-05-22              | 125.7              | 102.06        | <sup>3</sup> |
| APP  | MO            | BPH921112MH  | 96.7             | 100.0              | 91-10-13              |                    |               |              |
| First Come First Serve   |               |              |                  |                    |                       |                    |               |              |
| KMEMFM   | Memphis       |              | 244A             | 3.00               | 40-29-59              | 358.9              | 207.87        | 200          |
| LIC  | MO            | BLH820412AN  | 96.7             | 91.0               | 92-09-58              |                    |               | CLOSE        |
| *To channel 263C3 per D92-19   |               |              |                  |                    |                       |                    |               |              |
| WKXQ   | Rushville     |              | 244A             | 6.0                | 40-08-20              | 36.3               | 209.66        | 200          |
| LIC  | IL            | BLH950124KB  | 96.7             | 100.0              | 90-39-26              |                    |               | CLOSE        |
| WKXQ   | Rushville     |              | 244A             |                    | 40-08-20              | 36.3               | 209.66        | 200          |
| PDEL   | IL            | RM8617       | 96.7             | .0                 | 90-39-26              |                    |               | CLOSE        |
| PRM-Site Restricted 8.3KM NW   |               |              |                  |                    |                       |                    |               |              |
| WCXO   | Carlyle       |              | 244A             | 6.0                | 38-32-04              | 91.7               | 233.59        | 200          |
| CP   | IL            | BPH930607MG  | 96.7             | 100.0              | 89-26-19              |                    |               | CLEAR        |
| WCVSFM   | Virden        |              | 244A             | 6.0 DA             | 39-33-26              | 63.3               | 236.52        | 200          |
| LIC  | IL            | BLH930930KF  | 96.7             | 100.0              | 89-39-24              |                    |               | CLEAR        |

<sup>2</sup>Station KNSX ordered to channel 227C2 per FCC action in MM Docket No. 87-335. Station KNSX holds a construction permit (BPH-910822JU) for operation on channel 227C2. In addition, station KNSX has proposed an upgrade in its allotment to channel 227C1 (MM Docket No. 90-66).

<sup>3</sup>Alternative for Bourbon, MO allotment proposed on channel 231A (See Figure 3).

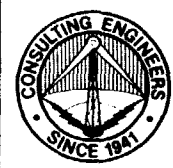
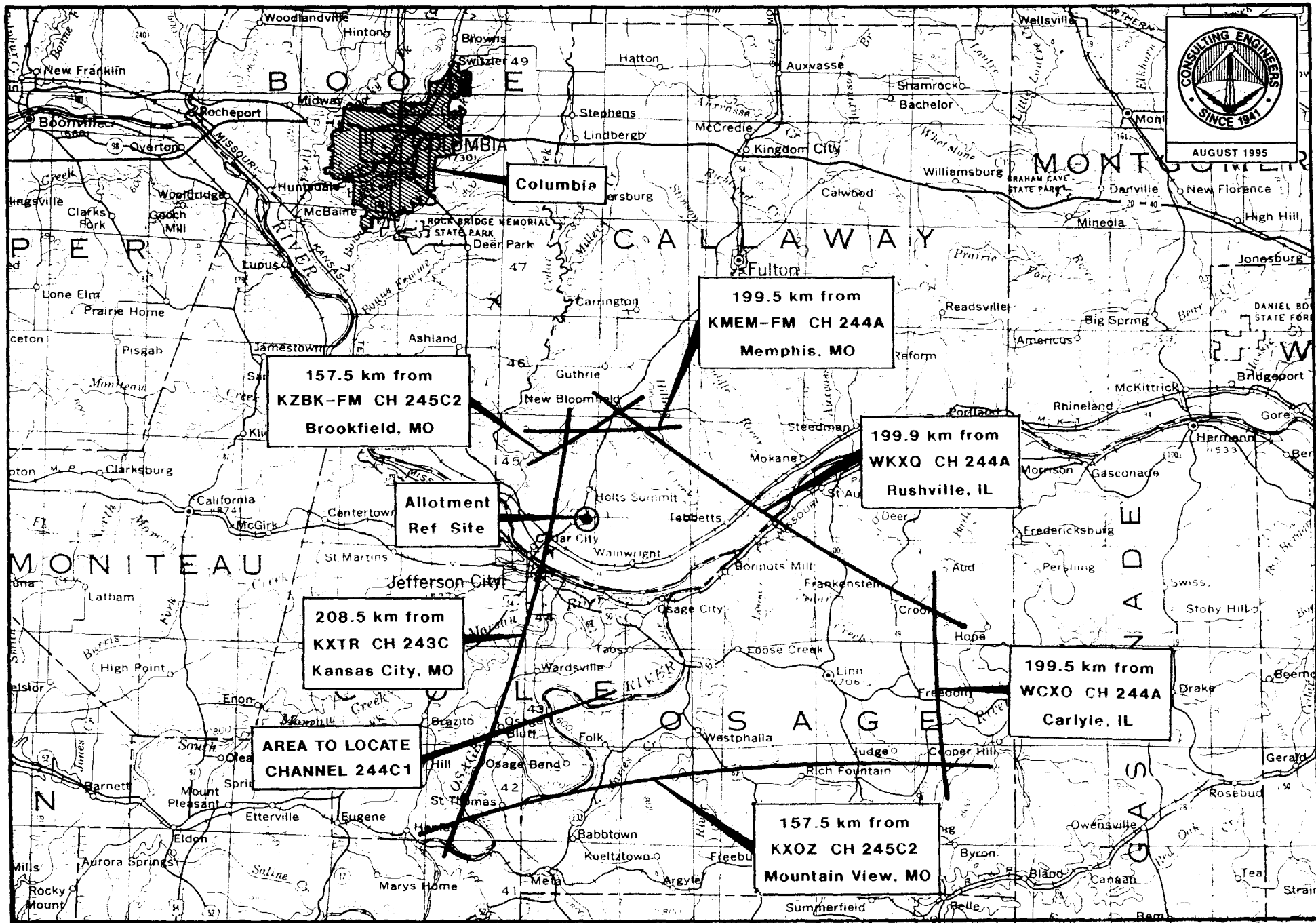


# FM SEPARATION STUDY

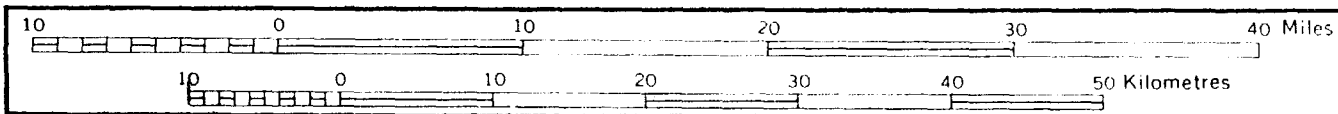
Job Title :Proposed KCMQ C1 Allotment Upgrade      Separation Buffer 50 km  
FCC DB Date : 08/17/95  
Channel 244C1 ( 96.7 MHz)      Coordinates : 38-37-40 92-07-00

| Call<br>Status   | City<br>State       | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|--|---------------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KZBKFM<br>CPM  | Brookfield<br>MO    | BMPH940921IE | 245C2<br>96.9    | 50.0<br>150.0      | 39-54-32<br>93-04-34  | 330.2              | 164.58        | 158<br>CLOSE |
| From Channel 249A per D88-435  |                     |              |                  |                    |                       |                    |               |              |
| KXOZ<br>LIC  | Mountain View<br>MO | BLH900430KC  | 245C2<br>96.9    | 50.<br>150.0       | 36-59-29<br>91-47-41  | 171.1              | 183.83        | 158<br>CLEAR |
| KOSY<br>CPM  | La Monte<br>MO      | BMPH910425IB | 246C3<br>97.1    | 25.<br>100.0       | 38-46-39<br>93-25-55  | 278.7              | 115.63        | 76<br>CLEAR  |
| CP canceled & Call Sign Deleted by letter dated 930527-Petition for Recon.<br>930628-Denied 950717 |                     |              |                  |                    |                       |                    |               |              |
| KXOKFM<br>LIC  | Florissant<br>MO    | BLH851127KC  | 246C1<br>97.1    | 100.<br>171.0      | 38-46-45<br>90-43-43  | 81.6               | 121.92        | 82<br>CLEAR  |
| NEW<br>APP   | Moberly<br>MO       | BPH940120MF  | 247C3<br>97.3    | 25.<br>100.0       | 39-26-02<br>92-14-24  | 353.3              | 90.13         | 76<br>CLOSE  |
| ALC  | Moberly<br>MO       | Docket93-222 | 247C3<br>97.3    | .0                 | 39-26-22<br>92-15-28  | 352.4              | 90.94         | 76<br>CLOSE  |
| Site Restricted-Effective 12-27-93   |                     |              |                  |                    |                       |                    |               |              |
| NEW<br>APP   | Moberly<br>MO       | BPH940119MB  | 247C3<br>97.3    | 16.<br>123.0       | 39-28-09<br>92-15-51  | 352.3              | 94.29         | 76<br>CLEAR  |
| PADD   | Gerald<br>MO        | RM8145       | 297C3<br>107.3   | .0                 | 38-18-00<br>91-22-30  | 119.2              | 74.27         | 24<br>CLEAR  |
| Counterproposal-Site Restricted 11.7km South   |                     |              |                  |                    |                       |                    |               |              |

\*\* End of separation study for channel 244C1 \*\*



AUGUST 1995



FM SEPARATION STUDY

Job Title :Proposed Dixon 221A Allotment

Separation Buffer 32 km

FCC DB Date : 08/17/95

Channel 221A ( 92.1 MHz)

Coordinates : 37-58-30 92-10-10

| Call<br>Status                      | City<br>State        | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|-------------------------------------|----------------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KCVOFM<br>LIC                       | Camdenton<br>MO      | BLED930420KE | 219C3<br>91.7    | 10.0<br>133.0      | 38-01-13<br>92-45-27  | 275.8              | 51.91         | 42<br>CLOSE  |
| NEW<br>APP                          | Marshfield<br>MO     | BPED950627MF | 220A<br>91.9     | 3.0<br>64.0        | 37-19-09<br>92-57-43  | 224.0              | 100.96        | 72<br>CLEAR  |
| PADD                                | Dixon<br>MO          | RM8146       | 221A<br>92.1     | .0                 | 37-58-30<br>92-10-10  | .0                 | .00           |              |
| Counterproposal Alternate Channel   |                      |              |                  |                    |                       |                    |               |              |
| KKOZ<br>PADD<br>PRM                 | Ava<br>MO            | RM7866       | 221A<br>92.1     | .0                 | 36-55-48<br>92-39-19  | 200.4              | 123.70        | 115<br>CLOSE |
| KSDL<br>LIC                         | Sedalia<br>MO        | BLH7620      | 221A<br>92.1     | 3.00<br>85.0       | 38-43-52<br>93-13-32  | 312.7              | 124.78        | 115<br>CLOSE |
| KMFC<br>LIC                         | Centralia<br>MO      | BLH860212KG  | 221A<br>92.1     | 1.85<br>122.0      | 39-09-58<br>92-09-52  | .2                 | 132.23        | 115<br>CLEAR |
| KKOZFM<br>LIC                       | Ava<br>MO            | BLH900518KI  | 222A<br>92.3     | 4.00<br>116.0      | 36-55-48<br>92-39-19  | 200.4              | 123.70        | 72<br>CLEAR  |
| WILFM<br>LIC                        | St. Louis<br>MO      | BLH890707KC  | 222C<br>92.3     | 100.<br>300.0      | 38-28-56<br>90-23-53  | 69.4               | 165.02        | 165<br>CLOSE |
| KCMG<br>PADD<br>PRM                 | Mountain Grove<br>MO | RM7866       | 223A<br>92.5     | .0                 | 37-08-07<br>92-14-59  | 184.4              | 93.48         | 31<br>CLEAR  |
| KLOZ<br>LIC                         | Eldon<br>MO          | BLH890828KE  | 224C2<br>92.7    | 31.0<br>189.0      | 38-20-27<br>92-35-33  | 317.9              | 55.00         | 55<br>CLOSE  |
| KJPWFM<br>PADD<br>PRM-Pet for Recon | Waynesville<br>MO    | RM6701       | 274A<br>102.7    | .0                 | 37-49-09<br>92-09-06  | 174.8              | 17.38         | 10<br>CLOSE  |

FM SEPARATION STUDY

Job Title :Proposed Dixon 231A Allotment

Separation Buffer 32 km

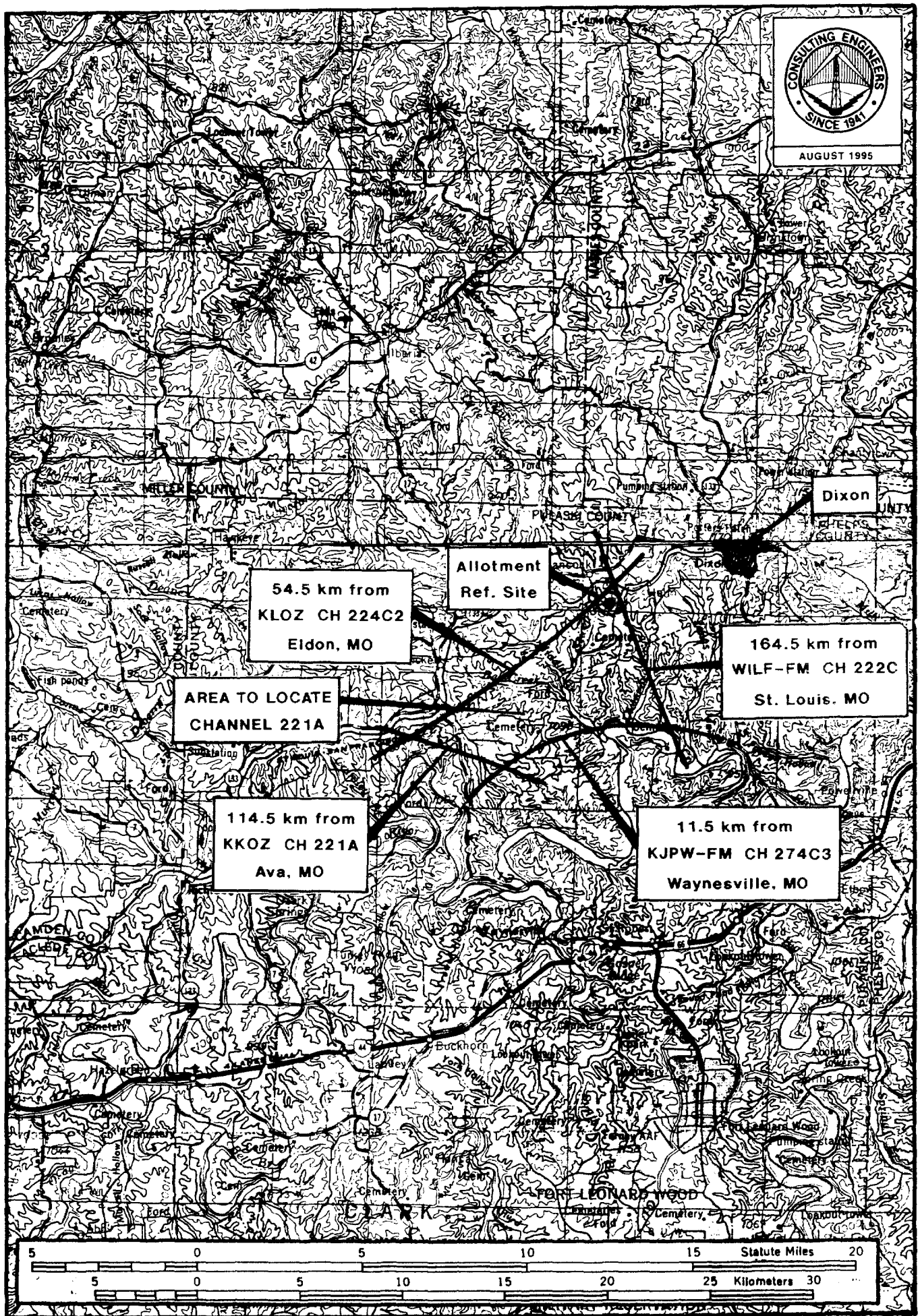
FCC DB Date : 08/17/95

Channel 221A ( 92.1 MHz)

Coordinates : 37-58-30 92-10-10

| Call<br>Status                          | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|---|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KJPWFM                                  | Waynesville   |              | 274C3            |                    | 37-49-09              | 174.8              | 17.38         | 12           |
| PADD                                    | MO            | Docket89-120 | 102.7            | .0                 | 92-09-06              |                    |               | CLOSE        |
| Counterproposal in 89-120-Pet for Recon |               |              |                  |                    |                       |                    |               |              |
| KQUL                                    | Lake Ozark    |              | 274A             | 6.0                | 38-02-06              | 280.8              | 36.27         | 10           |
| LIC                                     | MO            | BLH940516KZ  | 102.7            | 100.0              | 92-34-31              |                    |               | CLEAR        |

\*\* End of separation study for channel 221A \*\*



FM SEPARATION STUDY

Job Title : Proposed Bourbon 231A Allotment      Separation Buffer 32 km  
FCC DB Date : 08/17/95  
Channel 231A ( 94.1 MHz)      Coordinates : 38-05-00 91-15-00

| Call<br>Status   | City<br>State       | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km) | Req.<br>(km) |
|--|---------------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| ALC  | Osage Beach<br>MO   | Docket90-66  | 228C3<br>93.5    | .0                 | 38-17-33<br>92-34-24  | 281.8              | 118.25        | 42<br>CLEAR  |
| Effective 6-29-92-Reserved for KYLC per D90-66-Petition for Recon filed 920616 in D90-66 |                     |              |                  |                    |                       |                    |               |              |
| KSDFM<br>LIC   | St. Louis<br>MO     | BLH800129AA  | 229C1<br>93.7    | 100.<br>262.0      | 38-34-05<br>90-19-55  | 55.8               | 96.65         | 75<br>CLEAR  |
| KSPQ<br>LIC  | West Plains<br>MO   | BLH890201KC  | 230C1<br>93.9    | 100.<br>198.0      | 37-00-12<br>91-54-24  | 205.9              | 133.18        | 133<br>CLOSE |
| PADD<br>PRM-Alternate Channel  | Bourbon<br>MO       | RM8062       | 231A<br>94.1     | .0                 | 38-05-00<br>91-15-00  | .0                 | .00           |              |
| PADD   | Leasburg<br>MO      | RM8144       | 231A<br>94.1     | .0                 | 38-05-18<br>91-16-04  | 289.7              | 1.67          | <sup>1</sup> |
| Counterproposal-Alternate Channel-Site Restricted 2.1km east                             |                     |              |                  |                    |                       |                    |               |              |
| KPCRFM<br>LIC  | Bowling Green<br>MO | BLH911018KG  | 231C3<br>94.1    | 25.0<br>82.0       | 39-21-57<br>91-10-45  | 2.4                | 142.51        | 142<br>CLOSE |
| WMIXFM<br>LIC  | Mount Vernon<br>IL  | BLH2581      | 231B<br>94.1     | 50.<br>168.0       | 38-22-14<br>88-55-20  | 80.4               | 206.31        | 178<br>CLEAR |
| GRANDFATHERED AT 50KW @ 168M HAAT.   |                     |              |                  |                    |                       |                    |               |              |
| KATI<br>CP   | California<br>MO    | BPH931112ID  | 232C2<br>94.3    | 50.<br>150.0       | 38-31-25<br>92-24-25  | 296.2              | 112.39        | 106<br>CLOSE |
| From channel 232A per D91-181  |                     |              |                  |                    |                       |                    |               |              |
| KSHE<br>LIC  | Crestwood<br>MO     | BLH870504KB  | 234C<br>94.7     | 100.<br>313.0      | 38-34-24<br>90-19-30  | 55.7               | 97.48         | 95<br>CLOSE  |

\*\* End of separation study for channel 231A \*\*

<sup>1</sup>Petition for rule making for channels 231A, 263A, or 297A at Leasburg dismissed. MM Docket No. 92-214, RM-8144



FM SEPARATION STUDY

Job Title : Proposed Cuba, MO Allotment      Separation Buffer 50 km  
FCC DB Date : 08/31/95  
Channel 297C3 (107.3 MHz)      Coordinates : 38-03-49 91-24-37

| Call<br>Status   | City<br>State        | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km)      | Req.<br>(km) |
|--|----------------------|--------------|------------------|--------------------|-----------------------|--------------------|--------------------|--------------|
| PADD   | Dixon<br>MO          | RM8146       | 243A<br>96.5     | .0                 | 38-06-00<br>92-01-00  | 274.5              | 53.37 <sup>1</sup> | 12           |
| Counterproposal-Site Restriction 13.9km northeast                    |                      |              |                  |                    |                       |                    |                    |              |
| KNSX<br>LIC  | Steelville<br>MO     |              | 244A<br>96.7     | 0.50<br>195.0      | 37-55-40<br>91-26-50  | 192.1              | 15.43 <sup>2</sup> | 12           |
| *TO CHANNEL 227C2 PER D87-335  |                      |              |                  |                    |                       |                    |                    |              |
| NEW<br>APP   | Bourbon<br>MO        |              | 244A<br>96.7     | 3.<br>100.0        | 38-05-22<br>91-10-13  | 82.1               | 21.26 <sup>3</sup> | 12           |
| First Come First Serve   |                      |              |                  |                    |                       |                    |                    |              |
| ALC  | Bourbon<br>MO        | Docket89-74  | 244A<br>96.7     | .0                 | 38-06-10<br>91-10-22  | 78.1               | 21.30 <sup>3</sup> | 12           |
| Site Restricted-Effective 2-28-91-"First Come/First Served Allotment |                      |              |                  |                    |                       |                    |                    |              |
| KTX<br>LIC   | Jefferson City<br>MO |              | 295C<br>106.9    | 100.<br>381.0      | 38-38-16<br>92-29-34  | 304.4              | 114.10             | 96<br>CLEAR  |
| KBMVFM<br>LIC  | Birch Tree<br>MO     |              | 296A<br>107.1    | 3.00<br>91.0       | 36-59-07<br>91-32-54  | 185.8              | 120.31             | 89<br>CLEAR  |
| *To channel 296C3 per D90-411  |                      |              |                  |                    |                       |                    |                    |              |
| KBMVFM<br>CP   | Birch Tree<br>MO     |              | 296A<br>107.1    | 2.00<br>109.0      | 36-59-07<br>91-32-54  | 185.8              | 120.31             | 89<br>CLEAR  |
| *To channel 296C3 per D90-411  |                      |              |                  |                    |                       |                    |                    |              |

<sup>1</sup>Alternative for Dixon, MO allotment proposed on channel 221A.

<sup>2</sup>Station KNSX ordered to channel 227C2 per FCC action in MM Docket No. 87-355. Station KNSX holds a construction permit (BPH-910822JU) for operation on channel 227C2. In addition, station KNSX has proposed an upgrade to channel 227C1 (MM Docket No. 90-66).

<sup>3</sup>Alternative for Bourbon, MO allotment proposed on channel 231A



# FM SEPARATION STUDY

Job Title : Proposed Cuba, MO Allotment      Separation Buffer 50 km  
FCC DB Date : 08/31/95  
Channel 297C3 (107.3 MHz)      Coordinates : 38-03-49 91-24-37

| Call<br>Status                                  | City<br>State | FCC File No. | Channel<br>Freq. | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bearing<br>deg-Tru | Dist.<br>(km)      | Req.<br>(km) |
|---|---------------|--------------|------------------|--------------------|-----------------------|--------------------|--------------------|--------------|
| KBMVFM  | Birch Tree    |              | 296C3            | 15.0               | 36-59-07              | 185.8              | 120.31             | 99           |
| CPM   | MO            | BMPH940218IA | 107.1            | 100.0              | 91-32-54              | SS                 |                    | CLEAR        |
| From Channel 296A per D90-411                   |               |              |                  |                    |                       |                    |                    |              |
| KBMVFM  | Birch Tree    |              | 296A             | 5.1                | 36-59-07              | 185.9              | 120.32             | 89           |
| APP   | MO            | BMLH921016KC | 107.1            | 109.0              | 91-32-58              |                    |                    | CLEAR        |
| *To channel 296C3 per D90-411                   |               |              |                  |                    |                       |                    |                    |              |
| KFXE  | Cuba          |              | 297C3            |                    | 38-03-49              | .0                 | .00                |              |
| PADD  | MO            | RM8147       | 107.3            | .0                 | 91-24-37              |                    |                    |              |
| Counterproposal, MM Docket No. 92-214           |               |              |                  |                    |                       |                    |                    |              |
|   | Leasburg      |              | 297A             |                    | 38-10-00              | 30.4               | 13.29 <sup>4</sup> |              |
| PADD  | MO            | RM8144       | 107.3            | .0                 | 91-20-00              |                    |                    |              |
| Counterproposal-Site Restricted 9.4km Northeast |               |              |                  |                    |                       |                    |                    |              |
|   | Bourbon       |              | 297A             |                    | 38-08-30              | 55.3               | 15.30 <sup>3</sup> |              |
| PADD  | MO            | RM8062       | 107.3            | .0                 | 91-16-00              |                    |                    |              |
| PRM-Site Restricted 2.6 km Southwest            |               |              |                  |                    |                       |                    |                    |              |
|   | Gerald        |              | 297C3            |                    | 38-18-00              | 6.7                | 26.43 <sup>5</sup> |              |
| PADD  | MO            | RM8145       | 107.3            | .0                 | 91-22-30              |                    |                    |              |
| Counterproposal-Site Restricted 11.7km South    |               |              |                  |                    |                       |                    |                    |              |
| WDDDFM  | Marion        |              | 297B             | 50.                | 37-45-15              | 98.2               | 220.40             | 211          |
| LIC   | IL            | BLH850305KR  | 107.3            | 150.0              | 88-56-05              |                    |                    | CLOSE        |
| KISF  | Lexington     |              | 297C             | 100.               | 39-02-15              | 297.1              | 244.82             | 237          |
| LIC   | MO            | BLH890523KC  | 107.3            | 361.0              | 93-55-48              |                    |                    | CLOSE        |
|   | Monroe City   |              | 298A             |                    | 39-35-12              | 348.9              | 172.42             | 89           |
| ALC   | MO            | Docket91-181 | 107.5            | .0                 | 91-47-57              |                    |                    | CLEAR        |
| Effective 6-27-94-Reserved for KDM per D91-181  |               |              |                  |                    |                       |                    |                    |              |

<sup>4</sup>Petition for rule making for channels 231A, 263A or 297A at Leasburg, MO dismissed. MM Docket No. 92-214, RM-8144

<sup>5</sup>Petition for rule making for channel 297C3 at Gerald, MO dismissed. MM Docket No. 92-214, RM-8145